



Report To:	Cabinet
Date:	30/06/26
Subject:	Housing Annual Complaints and Service Improvement Report and Self-Assessment against the Housing Ombudsman Code. SHDC Housing Comments, Compliments and Complaints Policy
Purpose:	Update members on performance of our Complaints Service 25/26 against the Housing Ombudsman Code and to adopt the SHDC Housing Comments, Compliments and Complaints Policy.
Key Decision:	No
Portfolio Holder:	Portfolio Holder for Strategic and Operational Housing
Report Of:	Vikki Cherry, Service Director for Housing
Report Author:	Beverley Chapman, Tenant Engagement and Influence Lead
Ward(s) Affected:	All
Exempt Report:	No

Summary

The Housing Comments, Compliments and Complaints Policy has been updated to ensure that all tenants are treated fairly and that any issues or dissatisfaction with the services provided by the Council in its role as a social housing landlord are addressed promptly and effectively, and that all concerns receive a response and resolution.

Each year the Housing Complaints Service also produces an Annual Complaints Performance and Service Improvement document (Appendix 4) and assess us against the Housing Ombudsman Code (Appendix 5) which form part of the annual submission requirements by the Housing Ombudsman.

This report is to highlight to Members the amendments made to the Housing Comments, Compliments and Complaints Policy and for Cabinet to scrutinise the Housing Annual Complaints Performance and Service Improvement Report for 2025/26 at Appendix 4 and note the Annual Housing Ombudsman Self-Assessment form at Appendix 5.

Recommendations

It is recommended that Cabinet:

- Adopts the Housing Comments, Compliments and Complaints Policy (Appendix 1).
- Delegates minor operational and legislative amendments to the Housing Comments, Compliments and Complaints Policy to the Service Director for Housing in consultation with the Portfolio Holder for Strategic and Operational Housing.
- Notes and endorses the Complaints Performance and Improvements planned reflected in the Housing Annual Complaints Performance and Service Improvement Report for 2025/26 at Appendix 4 and note the Annual Housing Ombudsman Self-Assessment form at Appendix 5.
- Agree the draft governing body response on slide 4 Appendix 4

Reasons for Recommendations

To ensure the Housing Landlord Services are compliant with the Housing Ombudsman Code and the Regulator of Social Housing requirements.

Other Options Considered

Do Nothing - not produce an Annual Complaints and Service Improvement Report or review our policy – this option is not recommended as it would leave the organisation with a policy that does not recognise the tenant's voice and a service that is not learning from internal assessments. The Regulator of Social Housing expects all social landlords to be accountable to tenants, addressing complaints fairly, effectively and promptly to build trust with tenants and put tenants' views at the heart of decision-making about the delivery of landlord services. If this option is chosen, the Council would not implement the changes suggested by the Housing Ombudsman after their 2026 policy review and it would also leave us non-compliant with the Housing Ombudsman Code.

1. Background

- 1.1 The Housing Ombudsman's Complaint Handling Code sets out best practice for landlord's complaint handling procedures, to enable a positive complaints culture across the social housing sector, regardless of the size or type of landlord. The Code encourages landlord-tenant relationships so that residents can raise a complaint if things go wrong.
- 1.2 The Complaints Handling Code requires social landlords to undertake an annual submission to the Housing Ombudsman on how well the organisation conforms with the Regulator's Code of Guidance on dealing with complaints relating to its landlord service.
- 1.3 The annual submission must include four key elements:

- SHDC self-assessment against the Complaint Handling Code
- SHDC Annual Complaint, Performance and Service Improvement Report
- The response of the Council's Governing Body to the Annual report
- The Council's Complaint Policy.

1.4 The Annual Complaint, performance and Service Improvement Report is required to provide the following information:

- The annual self-assessment against the Complaint Handling Code
- A qualitative and quantitative analysis of complaint handling performance, including a summary of complaint the Council has refused to accept
- Any findings of non-compliance with the Complaint Handling Code by the Housing Ombudsman
- The service improvements made because of learning from complaints
- Any annual report about the landlord's performance from the Ombudsman
- Any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

1.5 The Annual Complaints Performance and Service Improvement report must be reported to the landlords governing body and published on the section of its website relating to complaints.

1.6 The governing body's response to the report must be published alongside this.

1.7 The current Policy was developed and adopted by Cabinet in March 2024. The policy has been updated following adoption of the Tenant Engagement and Influence Strategy to include scrutiny of complaint performance by our Tenant Influence Panel. The policy has also been updated to reflect revisions to staffing structures, changes in approach to monitoring of Housing Complaints. Changes have been made following recommendations from tenants, the Housing Ombudsman and Policy Development Panel.

2. Report

2.1 In-line with the Housing Ombudsman Complaint Handling Code, SHDC operates a two-stage complaint process, ensuring accessibility, transparency and fairness for tenants.

2.2 The 2024 Policy has been reviewed in line with recognised best practice to provide assurance that it remains fit for purpose, compliant with relevant guidance, and supports effective service delivery.

2.3 Consultation has taken place with tenants and Policy Development Panel. Recommendations from the Housing Ombudsman, made during their March 2026 policy review, are also incorporated into the policy. Appendix 2 provides a summary of all changes made to the policy.

2.4 The review has strengthened the policy by:

- Clarifying the two-stage complaints process and service requests
- Strengthening timescales, roles, and responsibilities
- Improving accessibility, including reasonable adjustments and third-party representation
- Clarifying complaint outcomes, compensation routes, and learning processes

2.5 • Enhancing performance monitoring, tenant scrutiny, and governance oversight
 This is our second Annual report on Complaints since we began reporting on our complaint's performance. In addition to volumes and timeliness the report also highlights themes and root causes of complaints, those that have been upheld, a comparison to last year's data and lessons learned focussing on service improvements.

2.6 Performance Management on complaints is reviewed:

- Monthly at our Compliance Clinic by the Member Responsible for Complaints, Service Director for Housing, Executive Director - Communities, and Service Managers.
- Quarterly at our Complaints Working Group – by the Member Responsible for Complaints and Service Team leaders
- Quarterly by members at PMP
- Quarterly at our Tenant led Complaints and Performance Focus Group
- Quarterly by our Tenant Influence Panel
- Annually our Complaints and Service Improvement Report and self-assessment is scrutinised by Members at PMP and Cabinet and by our Tenants at the Complaints and Performance Focus Group and our Tenant Panel.

2.7 Highlights from Annual Complaints and Service Improvement report (Appendix 4):

Theme	Stage 1 Complaints	Stage 2 Complaints
Volumes of complaints	189 S1 received	12 S2 received
Timeliness of responses	97.88% for S1	100% for S2
Extensions to timescales – still in line with Housing Ombudsman	12 – 6.34%	1 – 8.33%
Comparison to last year	Decrease of 24 S1	Decrease of 16 S2
Reductions in complaints	During 2025 Damp Condensation and Mould works brought in-house resulting in 47% less complaints being received for that area compared to 24/25	Better S1 responses
Upheld / partially upheld	124 S1 66%	6 S2 50%
Not Upheld	48 S1 34%	6 S2 50%
Main reason for complaint – as tenant reported	79 Unreasonable delays in service 42%	6 Unreasonable delays in service 50%
Service area:		
Property Services	45%	4 complaints / 33.33%
Repairs	19%	4 complaints / 33.33%
Estate Management	17%	4 complaints / 33.33%
DCM	10%	
Voids	4%	
Business Support	3%	
ILO	2%	

- **Transparency** – Members scrutinise our performance through PMP and Tenants are involved in scrutinising performance through our Focus Group and Tenants Influence Panel

- **Service Improvements** – are being embedded into services and continuous improvement is taking place.

2.8 Priorities for the coming year:

Priority	Action by
Strengthen feedback mechanisms for the service by conducting sample phone satisfaction surveys	June 2026
Introduce sample audits on actions and learnings	July 2026
Improve the collection and usage of our demographic information to improve support for vulnerable tenants to enable them to complain and ensure their needs are properly understood and reflected in our learnings	August 2026
Work with our Transformation Team to ensure that complaints on repair timescales continue to drive our focus on the service during the Transformation review and going forward.	September 2026
Work with tenants to produce a simple, clear leaflet on the complaints process	October 2026

2.9 Each year we must also submit a self-assessment against the Housing Ombudsman Complaint Handling Code and provide details and evidence to substantiate or responses to each of the 72 requirements within the code.

2.10 This year we have consulted with our Complaints and Performance Focus Group and our Tenants Panel to provide feedback on the way in which SHDC approaches and deals with complaints from tenants.

2.11 Following our review this year and listening to our tenants and reviewing the complaints received for the year the self-assessment (Appendix 5) has highlighted 7 areas where we have identified further improvement which we can implement to strengthen our performance and compliance with the code. These fall under the following sections of the Code:

Section of code	Code Provision	Area for Improvement	Area of training	By when
Definition of a complaint	1.3		Complaint Workshops to take place with all internal staff, departments and contractors to improve access to complaints for tenants.	Oct 26
	1.4		Complaint Workshops to take place with all internal staff, departments and contractors to improve understanding of the difference between a service request and complaint.	Oct 26

	1.6	Check all transactional surveys include signposting to complaints		June 26
Exclusions	2.3		Complaint Workshops to take place through 26/27 with all internal staff, departments and Contractors to clarify understanding of timescales when complaints raised.	Oct 26
Accessibility and Awareness	3.2		Complaint Workshops to take place through 26/27 with all internal staff, departments and Contractors to remind them about our Complaints process.	Oct 26
	3.4	Work with tenants to devise a clear simple leaflet regarding complaints.		Oct 26
Complaint Handling Staff	4.3		Complaint Workshops to take place through 26/27 with all internal staff, departments and Contractors to remind them about recording and implementing learnings	Oct 26
Complaint Handling Process	5.4		Complaint Workshops to take place through 26/27 with all internal staff, departments and Contractors to remind them that all complaints regarding contractors should come through SHDC	Oct 26
	5.8	Sign off responses by Complaints Officer to be introduced.		July 26
Complaint Stages	6.5 S1 6.16 S2	To check all template letters regarding extensions, include Housing Ombudsman details		June 26
	6.6 S1 6.17 S2	Sample Audit learnings and actions to provide assurance for the service that all actions and learnings are implemented		Aug 26
Putting things right	7.1	Draft a compensation Policy in line with Housing Ombudsman guidance		Aug 26
	7.2 / 7.4			
	7.3	Sample audit actions to remedy complaint to assure effectiveness and satisfaction		Sept 26

2.12 All of the above improvements are in the process of being implemented and the training workshops being planned.

3.0 Conclusion

3.1 Housing Services has taken clear steps to improve our complaint handling and deliver better outcomes for our tenants. We remain committed to working with members and our tenants to remain transparent and listen to them.

3.2 We are using complaints to drive improvements where they are needed, and our focus remains on continuous improvement of the service, as highlighted by our self-assessment.

3.3 Action plan for improvements is drafted and will be monitored via our Complaints and Performance Focus Group and scrutinised by our Tenant Influence Panel.

3.4 Working with the tenants to review the Policy has led to a strong voice for the tenant being prominent throughout the policy, whilst maintaining compliance with the Housing Ombudsman Code of Practice.

Implications

South and East Lincolnshire Councils Partnership

None

Corporate Priorities

The Complaints Performance and Service Improvement Annual Report and Annual Self-Assessment and Policy will support the following Corporate Priority:

- *Our Council - Continue to ensure that our regulatory and statutory services remain fully compliant with all current and emerging legislation.*
- *Your Home – We will be a landlord of choice for our council housing tenants. Delivery of the Policies set out how we will make improvements to our service and take on board the views of our tenants.*

Staffing

None

Workforce Capacity Implications

None

Constitutional and Legal Implications

These documents do not form part of the Policy Framework in the Constitution and can be approved by Cabinet.

The Housing Ombudsman Scheme is approved by the Secretary of State under section 51 of the Housing Act 1996. Local housing authorities in England which are registered

providers of social housing must be members of the scheme. This policy supports compliance and mitigates the risk of complaint handling failure orders and/or financial penalties.

The Housing Complaints Working Group meets quarterly to review trends and analysis of complaints and information regarding benchmarked Stage 1 and Stage 2 complaints. Attended by the Service Director for Housing, Portfolio Holder for Strategic and Operational Housing, Information Manager and Data Protection Officer, Service Leads, Complaints Co-Ordinator and the Tenant Influence and Engagement Lead, this Group serves to ensure that all complaints have oversight from all relevant sections of the Council. It also holds Service leads to account in their role as investigating officers.

On 14th February 2023, Cabinet approved that the Service Director – Housing has authority to authorise payment of compensation in connection with complaints regarding the Council's function as a social landlord of up to £1,000 in consultation with the Portfolio Holder for Strategic and Operational Housing.

Data Protection

none

Financial

None

Risk Management

None

Stakeholder / Consultation / Timescales

POLICY:

Consultation was undertaken with tenants on 05 November 2025 who reviewed the policy as part of our engagement offer. The following changes have been incorporated:

- Tenants voice to be prominent throughout the policy, requesting additions of the Focus Group as a means of scrutiny.
- Transparency of the process to be highlighted to make sure all complaints were investigated fairly and consistently.
- Re-ordering of the policy to enable it to flow better for those reading it.
- Addition of a timeline of the process.
- Requested that Senior Officers and Team Leaders investigated Stage 1 complaints and that Senior Managers including Service Director for Housing investigated Stage 2 complaints. This way those closer to the operational work would be able to identify errors more consistently, implement changes and ensure they were successful.
- A review date for the policy should be added.

The policy was considered by PDP on 3rd February 2026, and the following changes have been incorporated:

- Timeframes in the process changed to reflect the code of practice

- How feedback on the complaints process is gained – ensuring satisfaction surveys are carried out.
- Retention periods for complaints added to the policy
- The timeframe to escalate from a Stage 1 to Stage 2 made clear.
- Compensation details removed with a Compensation Policy to be drafted following the Housing Ombudsman publishing new guidance on Compensation on 3 February 2026.

On 2 March 2026, after Policy Development Panel's scrutiny of the policy, the Council received correspondence from the Housing Ombudsman regarding their review of the 2024 policy. (The Council had not been notified in advance that this review was underway). 14 recommendations for change were made of which have been incorporated into the policy with their recommendations summarised in the summary document attached. As these updates reflect compliance with the Code, it was not considered necessary for Scrutiny to undertake a further review of the policy.

On 1st May 2026 the Housing Ombudsman also published guidance that people who have concerns about how councils manage social housing can now complain to an independent Ombudsman, even if they are not a tenant, under changes brought into force under the Renters Rights Act. Changes to the Local Government Act 1974, which come into effect on 1 May 2026, extend the jurisdiction of the Local Government and Social Care Ombudsman (LGSCO) to cover complaints about local authority social housing management from people who are not tenants. This has been incorporated into our Policy and any correspondence / complaints from non-tenants updated to reflect this.

The Portfolio Holder for Strategic and Operational Housing, Director for Communities and Information Manager and Data Protection Officer have also been consulted.

PERFORMANCE:

The Complaints Performance and Service Improvement Report and Action plan for improvements was taken to our Tenant Influence Panel on 6th May 2026 – the following changes have been incorporated:

- *The Panel wanted to acknowledge the report through a “Foreword” note which has been added.*
- *The Panel noted that Contractor complaints appeared high and requested a breakdown of which contractor area these related to in the report.*
- *The Panel noted that the report Title and who the information was for didn't include tenants and wanted this changing.*

The Complaints Performance and Service Improvement Report and Action plan for improvements was scrutinised by PMP on 27th May 2026 and the following changes have been incorporated:

- *Slide 14 on how the complaint was reported has been changed to be able to view this better.*

Reputation

Ongoing reviews of performance reduces the risk of reputational damage caused by enforcement from the Social Housing Regulator and/or the Housing Ombudsman (of which is published on the Ombudsman's website and social media channels).

Contracts

None

Crime and Disorder

None

Equality and Diversity / Human Rights / Safeguarding

The Council is committed to treating everyone fairly and shall ensure that it complies with the Equality Act 2010. The document is accessible to all.

Documents and access to the service has been designed to be fully inclusive regardless of the ethnicity, gender, sexuality, religious belief, or disability of service users or residents.

The Complaints Performance and service Improvement Report refers to reasonable adjustments taken to accommodate a person's needs.

The Policy makes reference to reasonable adjustments taken to accommodate a person's needs.

Where we identify, or a customer advises us of, a vulnerability we make reasonable adjustments to our services accordingly to meet the needs of those individuals. This may include altering the way we communicate with a customer to adjusting the service that we offer to that person. Each case will be judged on its individual merits to avoid a one size fits all approach.

Health and Wellbeing

By transparently sharing performance data with tenants and Members, the report demonstrates the Council's commitment to maintaining safe and healthy housing environments.

Climate Change and Environment Impact Assessment

Not Undertaken

Acronyms

None

Appendices

Appendices are listed below and attached to the back of the report:

Appendix 1	Housing Complaints Policy
Appendix 2	Summary of changes to the Policy
Appendix 3	Equality Impact Assessment
Appendix 4	Annual Complaints Performance and Service Improvement Report

Background Papers

Document Title	Where the Document can be viewed
Housing Ombudsman's Complaint Handling Code	https://www.housing-ombudsman.org.uk/wpcontent/uploads/2020/11/Complaint-HandlingCode.pdf

Chronological History of this Report

A report on this item has not been previously considered by a Council body

Report Approval

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